

IN THE CHANCERY COURT  
FOR WASHINGTON COUNTY, TENNESSEE  
AT JONESBOROUGH

BOBBY MacBRYAN GREEN,

PLAINTIFF / PETITIONER,

v.

JODI JONES,  
HOWELL SHERROD,  
BETTY ANN POLAHA, and  
MARY LEE JONDAHL,

DEFENDANTS / RESPONDENTS.

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Civil Action No. 41049

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SUPPLEMENTAL AFFIDAVIT OF BOBBY MacBRYAN GREEN

STATE OF TENNESSEE     ]  
COUNTY OF WASHINGTON ]

Bobby MacBryan Green, M.D., being duly sworn according to law, deposes and makes the following Affidavit of his own personal knowledge :

My name is Bobby MacBryan Green. I am currently a citizen and resident of Washington County, Tennessee. I am over 18 years of age and I am competent to make this Affidavit. I am the plaintiff in the above-captioned civil action.

1. The purpose of this Affidavit is the presentation of important relevant events which have occurred subsequent to the 8 September 2011 filing of the *Affidavit of Bobby MacBryan Green*, which is incorporated herein by reference. This Affidavit is offered in support of Plaintiff's *Motion to Alter or Amend* and all motions previously filed

by Plaintiff and made relevant by the *Motion to Alter or Amend*.

2. Paragraphs 3 and 4 below consist of background information essential to full understanding of the most recent occurrences.

3. Southside Neighborhood is home to over 3000 citizens of widely varied occupation and economic circumstance. I became President of Southside Neighborhood Organization [hereinafter "SNO"] on 19 October 2009. Thereafter, Defendant Mary Lee Jondahl, SNO Treasurer, phoned me with calls of increasing frequency and duration to make requests, suggestions, et cetera. For months, I struggled to comply both with Jondahl's escalating requests/suggestions and with the relevant parliamentary law. The task became increasingly difficult.

4. Shortly before 15 November 2010 I refused the Jondahl household's desire to preside at and to control/administer the publicized election on that day of new SNO officers. Instead, I ensured that the 15 November meeting/election was conducted with accountable transparency and in precise accord with every demand of Robert's Rules of Order, Newly Revised and of the *SNO Bylaws*. At the next SNO meeting, on 20 December 2010, Defendant Jondahl presented me with the signed declaration attached hereto as *Exhibit V*, and unloaded/abandoned in the hallway a carload of SNO property, including leaking paint cans.

5. On 26 September 2011 I observed on the official SNO website, [www.TreeStreets.us](http://www.TreeStreets.us), that the *Special Rules of Order* had been expunged and the *SNO Bylaws* had been very recently altered. One change to the *Bylaws* was the deletion of all reference to Robert's Rules of Order or any other parliamentary authority. This change represents a serious threat to the interests of minorities and absent members,

and is detrimental to stable and reliable and transparent functioning of the Organization. For example, I am advised and I verily believe that these diminutions have recently occurred : a timely advance copy of the Agenda for each monthly meeting is now being delivered only to an inner circle and is no longer being delivered to all email-accessible members; the approved Minutes and recent Agendas are no longer being provided to all members on the official SNO website or in any other manner; proposed and adopted Resolutions are no longer being provided to all members on the official SNO website, or by email, or in any other manner; the location of monthly meetings has varied, in violation of the *Special Rule of Order* fixing the time and place; and a precedent has been established for (purported) expulsion of dissenting members without notice or hearing. Had I been aware of the possibility of such a change in the *SNO Bylaws*, I would have lobbied strongly against it. I received no notice whatsoever of any proposed change to the *Bylaws*.

6. At 1:09PM on 26 September 2011, I sent to SNO Secretary Polaha a letter requesting relevant documentation; a copy of that letter along with Polaha's one-sentence response is attached hereto as *Exhibit U*. The only other response is described in paragraph 7.

7. On 27 September 2011, I received by U.S. Mail a letter in an envelope bearing Polaha's return address and postmarked 26 September 2011 PM. That letter bears the signatures of eight individuals and without citing any authority purports to expel me from membership in SNO. A copy of that letter is attached hereto as *Exhibit T*. A SNO check signed by Treasurer Jondahl was enclosed with the letter. I am aware of no precedent for such a letter of expulsion.

8. I am unaware of any legitimate proceedings against my right to SNO membership. I was totally surprised by the content of the letter which I received from Polaha on 27 September 2011, being the day following delivery of my member-request for documentation to Secretary Polaha, who is the mother of Defendant Jodi Jones, who is next door neighbor to Defendant Mary Lee Jondahl.

AND FURTHER THE AFFIANT SAITH NOT.

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Bobby MacBryan Green, M.D.  
Plaintiff/Petitioner

Attachments :

*Exhibit V* - Jondahl declaration received 20 December 2010

*Exhibit U* - letter sent on 26 September 2011 to Secretary Polaha and her reply

*Exhibit T* - letter received 27 September 2011

STATE OF TENNESSEE  
COUNTY OF WASHINGTON

On this day, Bobby MacBryan Green, with whom I am personally acquainted and who also presented trustworthy identification, appeared personally before me, and after being duly sworn and deposed, executed the above *Supplemental Affidavit of Bobby MacBryan Green*.

This the 20th day of October 2011.

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My commission expires:

